

171668



May 7, 1985

Mr. Karl J. Klepitsch, Jr., Chief
Waste Management Branch
USEPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Mechanical Power Division
Roller Bearing Operation
2400 Curtiss Street
Caller No. 1482
Downers Grove, IL 60515
312/969-1770
TWX 910/695-3224

Dear Mr. Klepitsch:

Rexnord Inc. requests withdrawal of its Part A application submitted November 3, 1980 for the Bearing Operation located at 2400 Curtiss Street, Downers Grove, Illinois 60515. A copy of the original application is enclosed. The facility I.D. Number is ILD 005455571.

The basis for our request is provided below. We will be happy to provide whatever additional information you require.

- ° S02 - 13,000 gal. The 13,000 gal. tank storage is composed of two 3,000 gal. tanks and one 7,000 gal. tank. One 3,000 gal. tank was the "in ground tank" shown on page 5 of the original application. This tank was removed in April of 1985. Rexnord has the manifests to prove that storage was never greater than 90 days. It is Rexnord's intention to replace this tank with three (3), 2,500 gal. above-ground tanks. Accumulation of hazardous waste in any of these tanks will never be greater than 90 days. Therefore, this 3,000 gal. storage tank should be removed from the Part A. A copy of a letter from Petrochem Services, Inc. documenting proper closure of this tank is attached to this letter.

The second 3,000 gal. storage tank is part of the wastewater treatment facility which is subject to regulation under Section 307B of the Clean Water Act. The tank accumulates a sludge which is hazardous waste as defined in 40CFR261.3. The tank meets the definition of a tank contained in 40CFR260.10. This tank is therefore exempted from the requirements of 40CFR265 by Section 40CFR265.1(c)10.

The 7,000 gal. tank is a process tank. Coolant is continuously circulated throughout the plant and this coolant returns to the 7,000 gal. tank. The coolant is continuously recirculated back to the other process units. The tank becomes an accumulation tank only when taken out of service as a process tank for maintenance purposes. No accumulation greater than 90 days has or will occur.



Mr. Karl J. Klepitsch, Jr.
USEPA - Region V
May 7, 1985
Page 2

- S01 - 400 gal. Rexnord should not have included container storage in the original application for the facility at 2400 Curtiss Street. First of all the "drum storage area" identified on page 5 of the original application refers to drums of unused materials - **NOT** wastes. Prior to October of 1980 there was drum storage of about 400 gals. at the Duralon Plant shown on page 5. The operations of this plant were changed in October of 1980, however, to minimize the amount of storage. After October of 1980 the waste generated and accumulated at this facility has been extremely low and the facility is a small quantity generator. The facility has a different address (2324 Curtiss Street) and a different EPA identification number (ILD 980825301). Therefore, operations of the facility should not be included in the Part A for the plant located at 2400 Curtiss Street, bearing the identification number ILD 005455571.
- T01 - 3600 gal. The 3600 gal. treatment tanks are part of the wastewater treatment facility which is subject to regulation under Section 307B of the Clean Water Act. The tanks treat influent wastewater which is a hazardous waste as defined in 40CFR261.3. These tanks meet the definition of a tank in 40CFR260.10. These tanks are therefore exempted from the requirements of 40CFR265 by Section 40CFR265.1(c)10.

Please let us know what, if any, additional information you require to withdraw our Part A Permit Application.

CERTIFICATION

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."



Leroy J. Ruesch
General Manager - Plant Operations

Attachments

cc Aaron Hardt
Rexnord - Milwaukee

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May 15, 1985

Corporate Offices
350 N. Sunny Slope
Brookfield, WI 53005
414/797-6900

TWX: 910/262-3405
TELEX: 26-727

Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, IL 62706

Attention: Rama K. Chaturvedi, Manager
Permit Program Development Unit
Permit Section

Reference: 0430300003 - DuPage County/Log #FA 133
Downers Grove/Rexnord ILD 005 455 571

Gentlemen:

Responsive to the January 25, 1985 letter from Lawrence W. Eastep to Rexnord concerning the Closure Plan for the above-referenced facility, please find enclosed herewith a revised Closure Plan for the facility. Also enclosed is a copy of a letter from the facility to the USEPA - Region V requesting withdrawal of its Part A TSD permit application and a copy of a letter to the IEPA certifying that an underground storage tank that had been a portion of its storage facility has been properly closed, plus a letter from Petrochem Services, Inc., the company that performed the cleanup.

Briefly stated, the above-referenced Rexnord facility has determined that it does not need to accumulate hazardous wastes on-site for greater than 90 day periods and that some portions of its Part A application relate to operations that were not properly included therein. Accordingly, this facility has requested the USEPA to withdraw its application for a TSD permit, but, until that occurs, this facility intends to continue to comply with the regulations relating to TSD facilities having Interim Status.

May 15, 1985
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If you have any questions regarding the revised Closure Plan or any statements in this letter, please do not hesitate to contact Rexnord about them.

Very truly yours,

Rexnord Inc.

**Aaron L. Hardt
Environmental Counsel
Legal Department
(414)797-5687**

Enc.

cc: M. Haney (attachments)

/crb

ALH:0515004R

**bcc: R. Fuys (Bearing)
J. Lorenzen (CH)
R. Muehl (CH)
V. Smith (CH)**

May 1, 1985

CLOSURE PLAN

This Closure Plan is for Rexnord Inc. - Bearing Operation at 2400 Curtiss Street, Downers Grove, Illinois, 60515.

The Closure Plan calls for complete removal of all hazardous wastes and contaminated residues. Therefore, post-closure care is not required. By adherence to this Closure Plan, the need for further maintenance of this facility will be minimized and post-closure escape of hazardous waste constituents, leachate, contaminated rainfall or waste decomposition products to the ground or surface waters or to the atmosphere will be controlled, minimized or eliminated to the extent necessary to protect human health and the environment, because all hazardous waste will have been removed from the facility.

The maximum inventory is defined as the total volume of wastes which could be present if all permitted tanks and containers were full. The maximum inventory of S01 is 400 gal. and the maximum inventory of S02 is 13,000 gal. The maximum inventory of wastes in treatment is 3,600 gal.

The expected year of closure is unknown, because this facility can be operated indefinitely. If this facility is closed, however, it is estimated that the activities described in this Plan will be completed in four weeks.

The method of closure and estimated closure costs is provided on the following page.

Rev. May 1, 1985

CLOSURE PLANS

PARTIALLY NEUTRALIZED Cu PLATING WASTE-CLOSURE PLAN

In the event the Plating Department was to be closed down, all tanks would be drained and cleaned. Cyanide containing solutions would be treated in the batch cyanide treatment tank and acid base solutions would be treated in the batch acid treatment tank. The chrome rinse and neutral rinse systems would be treated in the batch acid tank. The Cy rinse system would be treated in the batch cyanide treatment tank. The cleaner tank's contents would be dumped in the usual manner or treated in the batch cyanide treatment tank. Sludge generated would be accumulated and hauled to an EPA approved site. The empty tanks would be further washed until all hazardous waste residues were removed.

Remaining unused chemicals would be treated, transferred to other divisions within Rexnord with plating operations, or returned to the supplier.

Estimated Cost of Closure:

Treatments:	Batch Acid	\$3,800.00
	Batch Alkaline	3,900.00
Sludge Hauling:		8,300.00
Raw Material Disposal:		2,500.00
Clean out tanks (contract out):		<u>2,000.00</u>
	Total:	\$20,500.00

CLOSURE PLANS (Cont'd)

SOLVENT, COOLANT, OIL AND WATER CLOSURE PLAN

The underground tank contents have been pumped out and hauled away to the EPA approved site. The tank was cleaned and disposed of in accordance with EPA procedures. Certification of proper closure of this tank was mailed to IEPA in May, 1985. The cost to remove the underground tank was approximately \$16,000. This cost is not included in the Closure Plan since it has been paid.

Three 2,500 gallon above-ground tanks have been ordered as replacements. The cost estimate for removal of these tanks is provided below.

Estimated Cost of Closure:

Pump out tanks, 2500 gal. each	
haul, and dispose: \$700/Load x 3	\$2,100.00
Clean out tanks (contract out):	<u>2,000.00</u>
Total:	\$4,100.00

TOTAL Estimated Closure Cost:

Copper Plating Waste	\$20,500.00
Solvent, Coolant, Oil & Water	4,100.00
Engineering Certification	<u>1,000.00</u>
TOTAL:	<u>\$25,500.00</u>

Inter-Office



Date August 28, 1985

To Aaron Hardt

Subject EPA Permit Application Withdrawal

Dear Aaron:

Per our recent telephone conversation, attached is copy of the letter dated August 22 from the EPA regarding withdrawal of our Part A Hazardous Waste Permit Application. They have indicated the request was not signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (copy attached). The application was signed by L. J. Ruesch.

Would you please look this over, and advise what further action is necessary on our part. Please phone me if you require additional information.

Thanks for your assistance.

A handwritten signature in cursive script, appearing to read "Rudy Fuys".

Rudolph A. Fuys

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Attachment

cc L. J. Ruesch

AUG 27 1985



AUG 22 1985

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

5HS-JCK-13

Leroy J. Ruesch
General Manager
Plant Operations
Rexnord
2400 Curtiss Street
Downers Grove, Illinois 60515

RE: Permit Application Withdrawal Letter
FACILITY NAME: Rexnord
U.S. EPA ID NO.: ILD 005455571

Dear Mr. Ruesch:

This is to acknowledge receipt of your letter of May 7, 1985, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

We will assume your facility requires a permit, if no response is received in this office within 30 days. Accordingly, we will continue to process your application.

Please feel free to contact the Authorization and Information Section at (312) 836-6148 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Arthur S. Kawatachi".

Arthur S. Kawatachi, Chief
Information Unit

Enclosures

PLEASE NOTE

We have a new mailing address for all Region V RCRA activities.

**RCRA ACTIVITIES
Region V
P.O. Box A3587
Chicago, Illinois 60690-3587**

The following RCRA activities should be submitted to the address above:

- a. Inquiries on ID numbers;**
- b. Notification of Hazardous Waste Activity (EPA Form 8700-12);**
- c. Part A of the RCRA treatment, storage, and/or disposal (TSD) facility permit application, Form 1 (EPA Form 3510-1) and Form 3 (EPA Form 3510-3);**
- d. Part B of the RCRA TSD facility permit application;**
- e. Additional information/revisions to b, c, and d.**
- f. Manifest reports (exception, discrepancy and unmanifested waste);**
- g. Financial responsibility documents; and**
- h. Groundwater monitoring reports;**
- i. Closure documents; and**
- j. Annual reports.**

You may get information and answers to specific questions relating to Interim Status Standards and the Federal hazardous waste management program in your State by calling (312) 353-2197 and asking for RCRA hazardous waste regulations assistance. Region V has numerous technical staff who are available to help industry comply with the hazardous waste regulations under RCRA. Trained professionals provide accurate, up-to-date general information on the regulations and also answer questions regarding specific problems.

§ 270.11 Signatories to permit applications and reports.

(a) Applications. All permit applications shall be signed as follows:

(1) For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means (i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decisionmaking functions for the corporation, or (ii) the manager of one or more manufacturing, production or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

Note.—EPA does not require specific assignments or delegations of authority to responsible corporate officers identified in § 270.11(a)(1)(i). The Agency will presume that these responsible corporate officers have the requisite authority to sign permit applications unless the corporation has notified the Director to the contrary. Corporate procedures governing authority to sign permit applications may provide for assignment or delegation to applicable corporate positions under § 270.11(a)(1)(ii) rather than to specific individuals.

(2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or

(3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes: (i) The chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

(b) Reports. All reports required by permits and other information requested by the Director shall be signed by a person described in paragraph (a) of this section, or by a duly authorized representative of that person. A person is a duly authorized representative only if:

(1) The authorization is made in writing by a person described in paragraph (a) of this section;

(2) The authorization specifies either an individual or a position having responsibility for overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, or position of equivalent responsibility. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and

(3) The written authorization is submitted to the Director.

(c) Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Director prior to or together with any reports, information, or applications to be signed by an authorized representative.

(d) Certification. Any person signing a document under paragraphs (a) or (b) of this section shall make the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Subpart G—Closure and Post-Closure

Source: 46 FR 2875, Jan. 12, 1981, unless otherwise noted.

§ 265.110 Applicability.

Except as § 265.1 provides otherwise:

(a) Sections 265.111 through 265.115 (which concern closure) apply to the owners and operators of all hazardous waste management facilities; and

(b) Sections 265.117 through 265.120 (which concern post-closure care) apply to the owners and operators of all hazardous waste disposal facilities.

§ 265.111 Closure performance standard.

The owner or operator must close his facility in a manner that:

(a) Minimizes the need for further maintenance; and

(b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or to the atmosphere.

§ 265.112 Closure plan; amendment of plan.

(a) By May 19, 1981, the owner or operator must have a written closure plan. He must keep a copy of the closure plan and all revisions to the plan at the facility until closure is completed and certified in accordance with § 265.115. This plan must identify the steps necessary to completely or partially close the facility at any point during its intended operating life and to completely close the facility at the end of its intended operating life. The closure plan must include, at least:

(1) A description of how and when the facility will be partially closed, if applicable, and finally closed. The description must identify the maximum extent of the operation which will be unclosed during the life of the facility, and how the requirements of §§ 265.111, 265.113, 265.114, and 265.115 and the applicable closure requirements of §§ 265.197, 265.228, 265.280, 265.310, 265.351, 265.381, and 265.404 will be met;

(2) An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility;

(3) A description of the steps needed to decontaminate facility equipment during closure; and

(4) An estimate of the expected year of closure and a schedule for final closure. The schedule must include, at a minimum, the total time required to close the facility and the time required for intervening closure activities which will allow tracking of the progress of closure. (For example, in the case of a landfill, estimates of the time required to treat and dispose of all waste inventory and of the time required to place a final cover must be included.)

(b) The owner or operator may amend his closure plan at any time during the active life of the facility. (The active life of the facility is that period during which wastes are periodically received.) The owner or operator must amend the plan whenever changes in operating plans or facility design affect the closure plan, or whenever there is a change in the expected year of closure of the facility. The plan must be amended within 60 days of the changes.

(c) The owner or operator must submit his closure plan to the Regional Administrator at least 180 days before the date he expects to begin closure. The owner or operator must submit his closure plan to the Regional Administrator no later than 15 days after:

(1) Termination of interim status (except when a permit is issued to the facility simultaneously with termination of interim status; or

(2) Issuance of a judicial decree or compliance order under Section 3008 of RCRA to cease receiving wastes or close.

[Comment: The date when closure commences should be within 30 days after the date on which the owner or operator expects to receive the final volume of wastes.]

(d) The Regional Administrator will provide the owner or operator and the public, through a newspaper notice, the opportunity to submit written comments on the plan and request modifications of the plan within 30 days of the date of the notice. He will also, in response to a request or at his own discretion, hold a public hearing whenever such a hearing might clarify one or more issues concerning a closure plan. The Regional Administrator will give public notice of the hearing at least 30 days before it occurs.

(Public notice of the hearing may be given at the same time as notice of the opportunity for the public to submit written comments, and the two notices may be combined.) The Regional Administrator will approve, modify, or disapprove the plan within 90 days of its receipt. If the Regional Administrator does not approve the plan, the owner or operator must modify the plan or submit a new plan for approval within 30 days. The Regional Administrator will approve or modify this plan in writing within 60 days. If the Regional Administrator modifies the plan, this modified plan becomes the approved closure plan. The Regional Administrator's decision must assure that the approved closure plan is consistent with §§ 265.111, 265.113, 265.114, and 265.115 and the applicable requirements of §§ 265.197, 265.228, 265.280, 265.310, 265.351, 265.381 and 265.404. A copy of this modified plan must be mailed to the owner or operator. If the owner or operator plans to begin closure before November 19, 1981 he must submit the closure plan by May 19, 1981.

§ 265.113 Closure; time allowed for closure.

(a) Within 90 days after receiving the final volume of hazardous wastes, or 90 days after approval of the closure plan, if that is later, the owner or operator must treat, remove from the site, or dispose of on-site all hazardous wastes in accordance with the approved closure plan. The Regional Administrator may approve a longer period using the procedures under § 265.112(d) if the owner or operator demonstrates that:

(1)(i) The activities required to comply with this paragraph will, of necessity, take him longer than 90 days to complete; or

(ii)(A) The facility has the capacity to receive additional wastes;

(B) There is a reasonable likelihood that a person other than the owner or operator will recommence operation of the site; and

(C) Closure of the facility would be incompatible with continued operation of the site; and

(2) He has taken and will continue to take all steps to prevent threats to human health and the environment.

(b) The owner or operator must complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes or 180 days after approval of the closure plan. If that is later, The Regional Administrator may approve a longer closure period using the procedures under § 265.112(c) if the owner or operator demonstrates that:

(1)(i) The closure activities will, of necessity, take him longer than 180 days to complete; or

(ii)(A) The facility has the capacity to receive additional waste;

(B) There is a reasonable likelihood that a person other than the owner or operator will recommence operation of the site;

(C) Closure of the facility would be incompatible with continued operation of the site; and

(2) He has taken and will continue to take all steps to prevent threats to human health and the environment from the unclosed but inactive facility.

[Comment: Under paragraphs (a)(1)(ii) and (b)(1)(ii), of this Section, if operation of the facility is recommenced, the Regional Administrator may defer completion of closure activities until the new operation is terminated]

§ 265.114 Disposal or decontamination of equipment.

When closure is completed, all facility equipment and structures must have been properly disposed of, or decontaminated by removing all hazardous waste and residues.

§ 265.115 Certification of closure.

When closure is completed, the owner or operator must submit to the Regional Administrator certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

September 9, 1985

Corporate Offices
350 N. Sunny Slope
Brookfield, WI 53005
414/797-6900

TWX: 910/262-3405
TELEX: 26-727

Mr. Arthur S. Kawatachi, Chief
Information Unit
U.S. EPA - Region V
RCRA Activities

Re: Permit Application Withdrawal Letter
Facility Name: Rexnord
U.S. EPA ID No.: ILD 005455571

Dear Mr. Kawatachi:

Rexnord Inc. requests withdrawal of its Part A application submitted November 3, 1980 for its Bearing Operation located at 2400 Curtiss Street, Downers Grove, Illinois 60515.

Enclosed herewith is a detailed explanation why the application should be withdrawn. It is signed by Mr. Leroy J. Ruesch, our General Manager of Plant Operations at the Bearing Operation. Also enclosed herewith is a Closure Plan for the treatment, storage, or disposal of hazardous waste activities at the Bearing Operation.

If you have any questions regarding this request for permit application withdrawal or need any further information to effect it, please communicate with:

Mr. Aaron L. Hardt
Environmental Counsel
Rexnord Inc.
Legal Department
350 North Sunny Slope
Brookfield, WI 53005

(414) 797-5687

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who

September 9, 1985
Page No. 2

manage the system, or those persons responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Vance A. Smith
Secretary and Legal Counsel
for Rexnord Inc.

/kk

Enc.

cc: A. Hardt
L. Ruesch

ALH:090985102R



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

5HS-JCK-13

SEP 30 1985

Vance A. Smith
Secretary and Legal Counsel
for Rexnord Inc.
350 N. Sunny Slope
Brookfield, Wisconsin 53005

RE: Withdrawal of Part A (Wastewater
Treatment Unit and Storage
Fewer Than 90 Days)

FACILITY NAME: Rexnord
U.S. EPA ID NO.: ILD 005455571

Dear Mr. Smith:

This is to acknowledge that we have completed our review of your Part A Hazardous Waste Permit Application and your September 9, 1985 letter requesting withdrawal of your Application. According to the information you have submitted, your facility has a wastewater treatment unit, as defined in 40 CFR Part 260.10, and has accumulated wastes, which were generated on-site, for fewer than 90 days in containers or tanks since November 19, 1980, in accordance with 40 CFR Part 262.34. It is the opinion of this office, based on the information submitted, that your facility is not required to have a Hazardous Waste Permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you must ensure that your waste is handled in accordance with 40 CFR Part 262.34 (enclosed), and all applicable State and local requirements.

You will retain your United States Environmental Protection Agency identification number, if you notified as a generator of hazardous waste.

Please contact the Authorization and Information Section at (312) 886-6148 for assistance, if you have any questions. Please refer to "Withdrawal of Part A (Wastewater Treatment Unit and Storage Fewer Than 90 Days)," in all correspondence on this matter.

Sincerely,


David A. Stringham
Chief, Solid Waste Branch

Enclosure

cc: Leroy J. Ruesch
Rexnord Inc.

L. Eastep, IEPA